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5-5-05

Seattle Plant SPCC Plan Copy



LFC002628

**SPILL PREVENTION AND CONTROL AND  
COUNTERMEASURE PLAN**

**LONGVIEW FIBRE PAPER AND PACKAGING  
Corrugated Products Facility  
SEATTLE, WASHINGTON**

**LFPI**

**5901 EAST MARGINAL WAY SOUTH**

**SEATTLE, WA 98134**

**(206) 762-7170**

**April 4, 2003**

**Revised May 5, 2005**

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## CERTIFICATION

### LONGVIEW FIBRE COMPANY MANAGEMENT APPROVAL

This Spill Prevention, Control and Countermeasure Plan  
will be implemented as described herein.

Signature [Signature] Date 5-17-05

Title Plant Manager

Signature [Signature] Date 5/13/05

Title General Supervisor / Environmental Coordinator

## CERTIFICATION

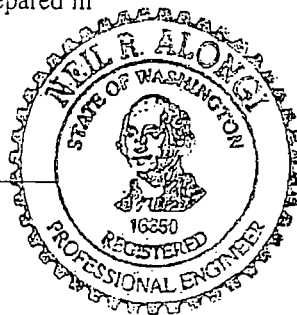
I hereby certify that I am familiar with the provisions of  
Title 40 CFR, Part 112, attest that this Spill Prevention,  
Control, and Countermeasure Plan has been prepared in  
accordance with its requirements.

Signature [Signature]

Neil Alongi, PE

Certificate No. 16650

Date April 4, 2003



EXPIRES: 9/23/03

## ACRONYMS AND ABBREVIATIONS

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API	American Petroleum Institute
BMPs	Best Management Practices
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
DOT	Department of Transportation
MFA	Maul Foster & Alongi, Inc.
Ecology	Washington Department of Ecology
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention Control and Countermeasure Plan
WAC	Washington Administrative Code

## 1 PURPOSE AND SCOPE

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### 1.1 Site Location

This Spill Prevention, Control, and Countermeasure Plan (SPCC) has been prepared for the Longview Fibre Company, Corrugated Products Facility located in Seattle, Washington.

Longview Fibre Company:

5901 East Marginal Way South  
Seattle, WA 98134  
(206) 762-7170

The facility is located off Highway 99 in a heavily industrialized area of the Duwamish Valley, less than a mile from the I-5 freeway. The Duwamish River lies just to the west of the facility and the King County International Airport is located approximately 2 miles to the southeast. The exact location is: latitude 47° 33' N, longitude 122° 20' W, township 24 N, range 4 E, section 19.

### 1.2 Site Facilities and Current Operations

The facility is situated on approximately 3.6 acres of industrially-zoned property. The plant manufactures corrugated boxes to specific orders from customers throughout the Northwest and Alaska. All manufacturing is located within one building complex of approximately 130,000 square feet. The Seattle facility was constructed in 1954, and has undergone equipment upgrades and modification at various times since then. Presently, the employment base consists of over 130 production, administrative and management employees. The capacity of the plant is over 80 million square feet of corrugated product per month.

A 5,000-gallon, double-walled, diesel tank is located on the southeast corner of the property. The diesel fuel is used as a backup fuel source for natural gas at the facility. In addition, several 55-gallon drums of petroleum products (lubrication and hydraulic oils) are stored within the main plant building near the boiler room. The drums are stored within a bermed area away from the main traffic flow within the building.

### 1.3 Compliance with State and Federal Regulations

This SPCC Plan is intended to comply with the Title 40 of the Code of Federal Regulations (CFR) Part 112, and has been designed to minimize the potential for oil discharges at the facility. An SPCC Plan is required by 40 CFR Part 112 for owners or operators of non-transportation related onshore facilities engaged in storing, transferring, or consuming oil and oil products, and that, due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon navigable waters of the United States or adjoining shorelines, or waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act, or affecting certain natural resources. In addition, this requirement is applicable to those operations that have total oil storage capacity greater than 1,320 gallons.

Under 40 CFR Part 112, oil is defined as "oil of any kind or in any form, including, but not limited to petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil". Throughout the remainder of this document the term "oil" will mean all substances regulated under 40 CFR Part 112.

The purpose of the SPCC Plan is to establish procedures, methods, equipment, and other measures to prevent, control, and counter the discharge of harmful quantities of oil into or upon the navigable waters of the United States, or their tributaries, pursuant to 40 CFR Part 112. The SPCC Plan is intended to identify and take preventive measures of foreseeable potential releases of oil to navigable waters.

## 2 SPCC PLAN REVIEW AND AMENDMENT REQUIREMENTS

This SPCC Plan will be reviewed and/or amended annually or whenever there is a change in facility design, construction, operation, or maintenance that materially affects the potential for discharge of oil into or upon the navigable waters of the United States. Amendments will be incorporated as soon as practical, but not later than six months after such change occurs.

Additionally, a professional engineer will complete a review and evaluation of the SPCC Plan at least once every five years. As a result of this review and evaluation, the plan will be amended within six months to include more effective prevention and control technology, if appropriate. Anytime a facility change or review and evaluation result in the need for technical SPCC Plan amendments, the SPCC Plan will be re-certified by a professional engineer consistent with 40 CFR Part 112.3.

Each review or amendment to the SPCC Plan will be documented in the *Review and Amendment Log* located in Appendix A. Documentation shall include a summary of the review or amendment, the number, date, and plan sections affected by the review or amendment and the name and signature of the person completing the review or amendment.

### 3 FACILITY STORAGE

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A 5,000 gallon, double-walled diesel tank is located on the southeast corner of the property. This tank serves as a backup fuel source to natural gas on-site. In addition, several 55-gallon drums of petroleum products (lubrication and hydraulic oils) are stored within the main plant building near the boiler room.

#### 3.1 Potential Spill Scenario

*Requirement Section: 40 CFR, Part 112.7(b)*

Since the tank is double-walled, a spill caused by a leak is unlikely. A spill would more likely occur during filling of the tank. This might be caused by loose or leaky connections, or overfill conditions. Such a spill would be partially contained since the tank is contained within a curbed area. Spilled oil in this contained area could then be drained to a sump near the train loading door where it could be properly reused or disposed of. The petroleum product materials stored in the 55-gallon drums are maintained within a bermed area away from traffic flow areas within the building, therefore the most likely spill scenario would result from container leaks or a transport accident. Leaks that may result from these drums would be contained within the building within the bermed area in which they are stored. A spill that may occur from transport would be observed by an operator and attended to immediately. A spill kit is located directly in front of the oil storage area.

#### 3.2 Storage Tanks

*Requirement Section: 40 CFR, Part 112.8(c)(1)*

The diesel tank is constructed of stainless steel. Tank materials and construction are compatible with the materials stored and conditions of storage such as pressure and temperature.

#### 3.3 Spill Prevention Systems

*Requirement Section: 40 CFR, Part 112.7(a)(3)(iii)*

This tank is double-walled and is within a curbed area.

### 3.4 Stormwater Discharge

*Requirement Section: 40 CFR, Part 112.8(c)(3)*

This tank is double-walled, so the potential of oil release to storm water is minimal. The tank and the surrounding curbed area is covered with a shed roof that prevents rainfall from entering the containment area.

The petroleum products stored within 55-gallon drums are maintained within the building and within a bermed area where spill can be contained and cleaned up without resulting in an impact to stormwater discharge.

## 4 SPILL RESPONSE AND REPORTING PROCEDURES

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*Requirement Section: 40 CFR, Part 112.7(a)(3)(iv)*

### 4.1 Spill History

According to facility personnel, no spills have occurred at the site within the past 24 months.

### 4.2 Spill Response Procedures

Longview Fibre is committed to the prevention of spills. Employee training, established work procedures, and the development of this SPCC plan are tools utilized by Longview Fibre to minimize the risk of spills. However, in the event of such a spill or release, Longview Fibre will initiate actions to minimize the impact and reoccurrence of the event.

In the event of a spill the following actions will be taken:

- Immediately stop product flow by securing pumps, closing valves, etc.
- Warn personnel and enforce safety and security measures
- Shut off all ignition sources, including motors, electrical circuits, open flames, etc.
- Contain/control the spill using berms, boom, water hose, etc.
- Notify the proper contacts as described in the Section 4.3: *Spill Reporting Procedures*

Based on information generated from the spill evaluation, Longview Fibre will implement those modifications that are deemed reasonable and appropriate for minimizing the risk of a similar event reoccurring.

### 4.3 Spill Reporting Procedures

All spills must be immediately reported to **George Mitchell, Plant Manager**, so that a determination may be made regarding the notification of authorities. George Mitchell can be reached at (206) 510-0921.

The Plant Manager, or designated alternative, will take immediate action in the event of:

- a. Any release or discharge of an Oil/Petroleum product to the environment, regardless of volume.
  - b. A release of a hazardous substance to the environment that either exceeds the reportable quantity under CERCLA, or that will take more than 24 hours to clean up.
- **National Response Center:** 1-800-424-8802 for oil and hazardous material spills above reportable quantity thresholds
  - **Washington State Spill Response Center:** 1-800-258-5990 or 1-800-OILS-911 for oil spills, regardless of volume

#### **Additional resource phone numbers:**

1. Washington State Department of Ecology:.....1-425-649-7000
2. Washington Dept of Fish/Wildlife:.....1-360-534-8233
3. U.S. EPA Region 10: .....1-206-553-1263
4. King County Emergency Management: .....1-206-296-3830
5. Police Department:.....911
6. Ambulance: .....911
7. Hospitals:  
    Providence Seattle Medical Center: .....1-206-320-2000  
    The Work Clinic: .....1-206-568-8577  
    Harborview Medical Center:.....1-206-731-3041
8. Washington Poison Center.....1-800-732-6985

Rainier Occupational Medical Center:.....1-206-568-8577  
Harborview Medical Center:.....1-206-731-3041

8. Washington Poison Center.....1-800-732-6985

#### Required Information:

Under state law, spills of oil/petroleum products of any volume are considered reportable and notification to the Washington State Spill Response Center must be made. Under federal law, spills of oil/petroleum products of any volume are considered reportable if the spill is to a navigable waters or adjoining shorelines. **Diagrams 4-1** and **4-2** at the end of this section a reportable quantities template, spill notification information and contact information.

In the event of a spill, all information on the Spill Response Notification Form, provided in Appendix D must be known at the time of notification, or be in the process of being collected. Do not delay spill notification to collect the information. All information must be documented using the Spill Response Notification form. Information given to entities should include:

- Reporting Party Information - your name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or spill
- Types of material(s) released or spilled
- Quantity and concentration of materials released or spilled
- Danger or threat posed by the release or spill
- Number and types of injuries (if any)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Follow-up reporting is required for a spill that exceeds a reportable quantity. Reports are solicited by Ecology staff within the Toxics Cleanup Program following referral by the State Spill Response Center and will usually call for a detailed description of the event,

#### **4.4 Spill Response Equipment**

We have four spill response kits on site. Two in the maintenance shop, one outside in compressor area, and one across from oil storage area.

#### **4.5 Designated Person Accountable for Spill Prevention, Response, and Notification**

*Requirement Section: 40 CFR, Part 112.7(f)(2)*

The designated person accountable for spill prevention, response, and notification at the site is the Plant Manager, George Mitchell, who can be reached at (206) 510-0921. Or Environmental Coordinator, Mike Anderson at (206) 793-2153.

#### **4.6 Spill Prevention Briefings**

*Requirement Section: 40 CFR, Part 112.7(f)*

Spill prevention is discussed frequently as part of the safety training program. Any near misses or incidents are discussed in order to prevent them from recurring. Employee feedback and recommendations are encouraged in spill prevention and operation.

Diagram 4-1: Washington State Release Notification Requirements

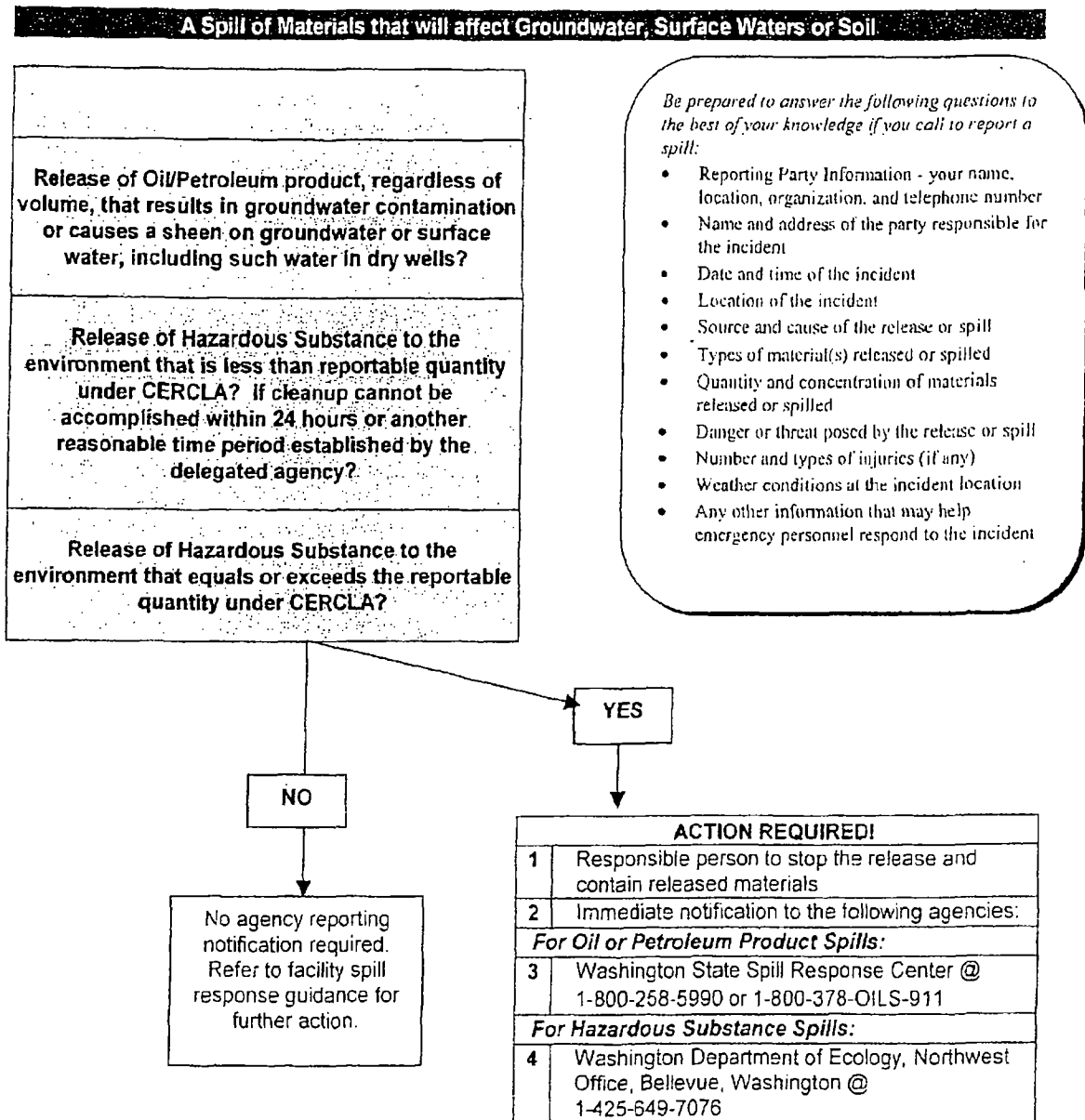
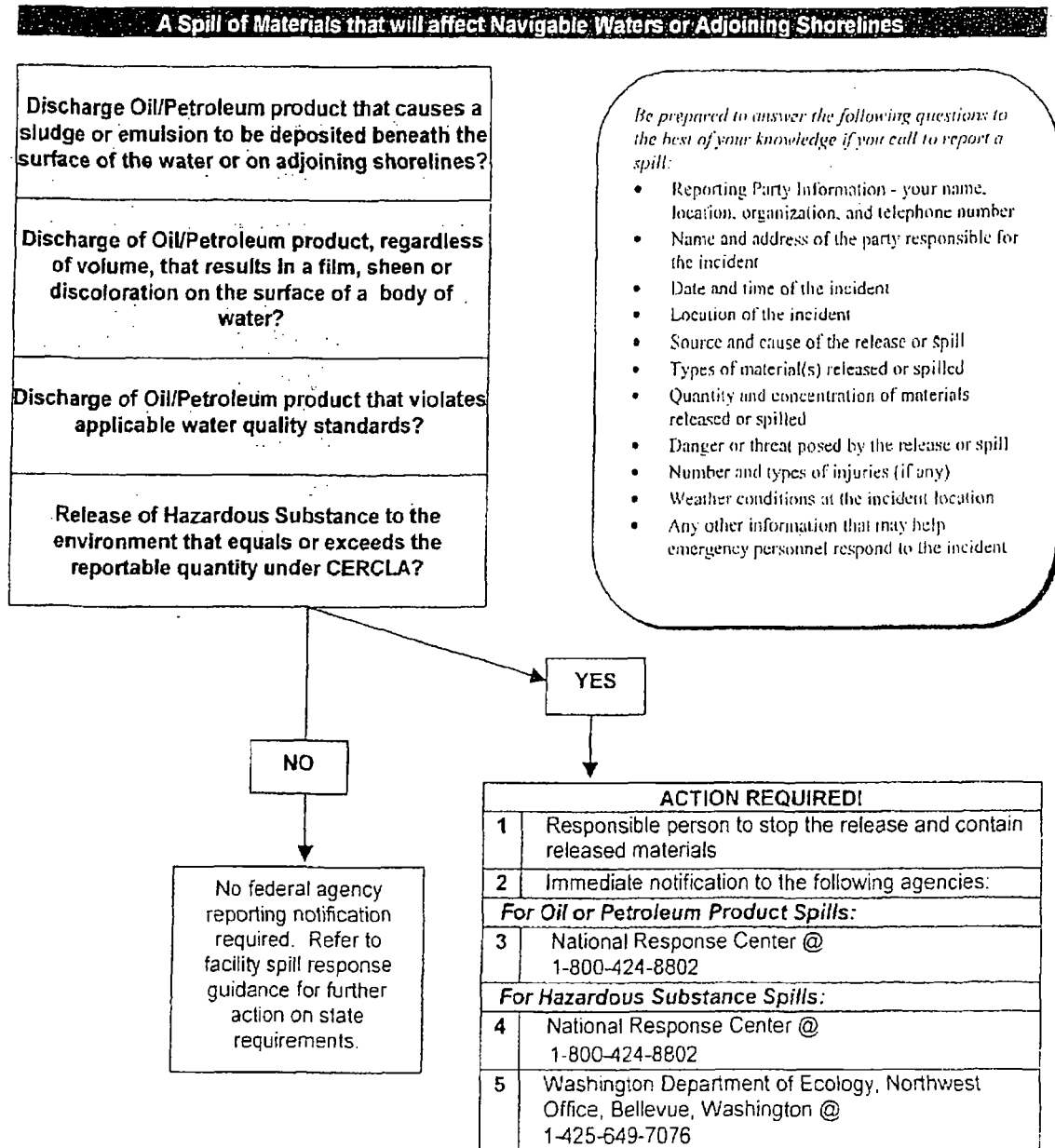


Diagram 4-2: EPA Release Notification Requirements



## 5 FACILITY DRAINAGE

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*Requirement Section: 40 CFR, Part 112.8(b)*

The plant is situated on approximately 3.6 acres of land, most of which (130,000 square feet or 2.98 acres) is contained within the facility. The remainder of the property is an asphalt-covered parking area and loading areas. The roof of the warehouse has a drain that drains to a catch basin on Fidalgo Street, which leads to an outfall to the Duwamish river. A diesel tank is located outside of the building under a shed roof and stormwater from the roof drains to the King County Sewage treatment facility.

## **6 TRANSFER OPERATIONS**

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*Requirement Section: 40 CFR, Part 112.7(a)(3)(ii)*

### **6.1 Belowground Piping**

There is a small portion of underground piping from the diesel tank to the boiler at the facility. This piping (about 50 feet) is checked for leaks according to the monthly inspection work order located in Appendix C.

### **6.2 Aboveground Piping**

Aboveground piping is used to transfer diesel from the tank to the boiler. All aboveground piping and associated valves are checked routinely according to the monthly inspection work order located in Appendix C.

### **6.3 Vehicular Traffic**

The tank is located away from any type of vehicular traffic.

### **6.4 Material Transfer**

During all refueling operations, the truck operator stands by with spill cleanup materials ready.

## 7 INSPECTIONS AND RECORDKEEPING

---

*Requirement Section: 40 CFR, Part 112.7(e) and 112.8(c)(6)*

### 7.1 Inspections

Monthly inspections will be conducted to assure the integrity of the outer containment wall of the diesel storage tank. Inspections are recorded on the monthly inspection work order provided in Appendix C.

In addition to visual testing, the spill detection alarm system will be tested, and recorded on the monthly inspection work order provided in Appendix C.

The initial integrity program will consist of evaluating diesel oil storage container, along with its supports and foundations, associated valves and piping, within five years and retesting tanks after each instance of material repair or at an interval no greater than 10 years. The frequency of and type of testing will take into account container size and design. Hydrostatic, radiographic, ultrasonic, acoustic emissions testing, or other method of non-destructive shell testing will be performed according to industry standards as needed. American Petroleum Institute Standard 653, and/or similar standards may be used to determine the appropriate testing methods and intervals (see Appendix F). Records of this testing will be maintained.

### 7.2 Recordkeeping

Completed inspection records are kept with the SPCC plan and maintained for at least three years.

## 8 SECURITY

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### 8.1 Fencing

*Requirement Section: 40 CFR, Part 112.7(g)(1)*

The diesel tank is fully fenced and remains locked. Only authorized personnel are allowed access.

### 8.2 Flow Valves

*Requirement Section: 40 CFR, Part 112.7(g)(2)*

Flow valves associated with diesel tank are contained in the fully fenced, locked tank area.

### 8.3 Starter Controls

*Requirement Section: 40 CFR, Part 112.7(g)(3)*

There are no starter controls located on-site.

### 8.4 Loading/Unloading Connections

*Requirement Section: 40 CFR, Part 112.7(g)(4)*

There are no pipelines at the site that are not in use or that are in standby service for an extended period of time.

## 8.5 Facility Lighting

*Requirement Section: 40 CFR, Part 112.7(g)(5)*

The area around the tank is well lit and provides sufficient light to allow personnel to discover and respond to oil spills during nighttime hours.

## 9 PERSONNEL TRAINING

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*Requirement Section: 40 CFR, Part 112.7(f)*

Employees who are responsible for maintenance, inspection, or spill response receive training and instruction on a regular basis to prevent and respond to spills. Such personnel will be informed of applicable environmental laws, rules, and regulations in addition to company policies, procedures, and BMPs related to spill prevention. This training is included with new employee orientation and annually as part of the facility safety-training program.

## 10 ALCOHOL AND DRUG AWARENESS PROGRAM

*Requirement Section: WAC 173-180D-060(11)*

Longview Fibre provides a safe and productive work environment for all employees. It is Longview Fibre policy that employees shall not be involved with the unlawful use, possession, sale, or transfer of drugs or narcotics. Further, employees shall refrain from unauthorized possession or consumption of alcoholic beverages on company time or company premises.

1. Employees are expected to report for work and remain at work in condition to perform assigned duties free from the effects of alcohol and drugs. Illegal drugs are those drugs defined as illegal under federal, state, or local laws.
2. Drug and alcohol tests will be conducted as a routine part of the pre-employment screening for all regular full-time applicants prior to employment. Applicants must satisfactorily pass the drug screen prior to reporting to work.
3. The use, sale or personal possession (e.g., on the person or in a desk, vehicle or tool box) of unauthorized alcohol or drugs while on the job, including rest periods and meal periods, or on company property is a dischargeable offense. Random drug and alcohol tests are conducted to ensure a safe workplace.

## LIMITATIONS

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The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

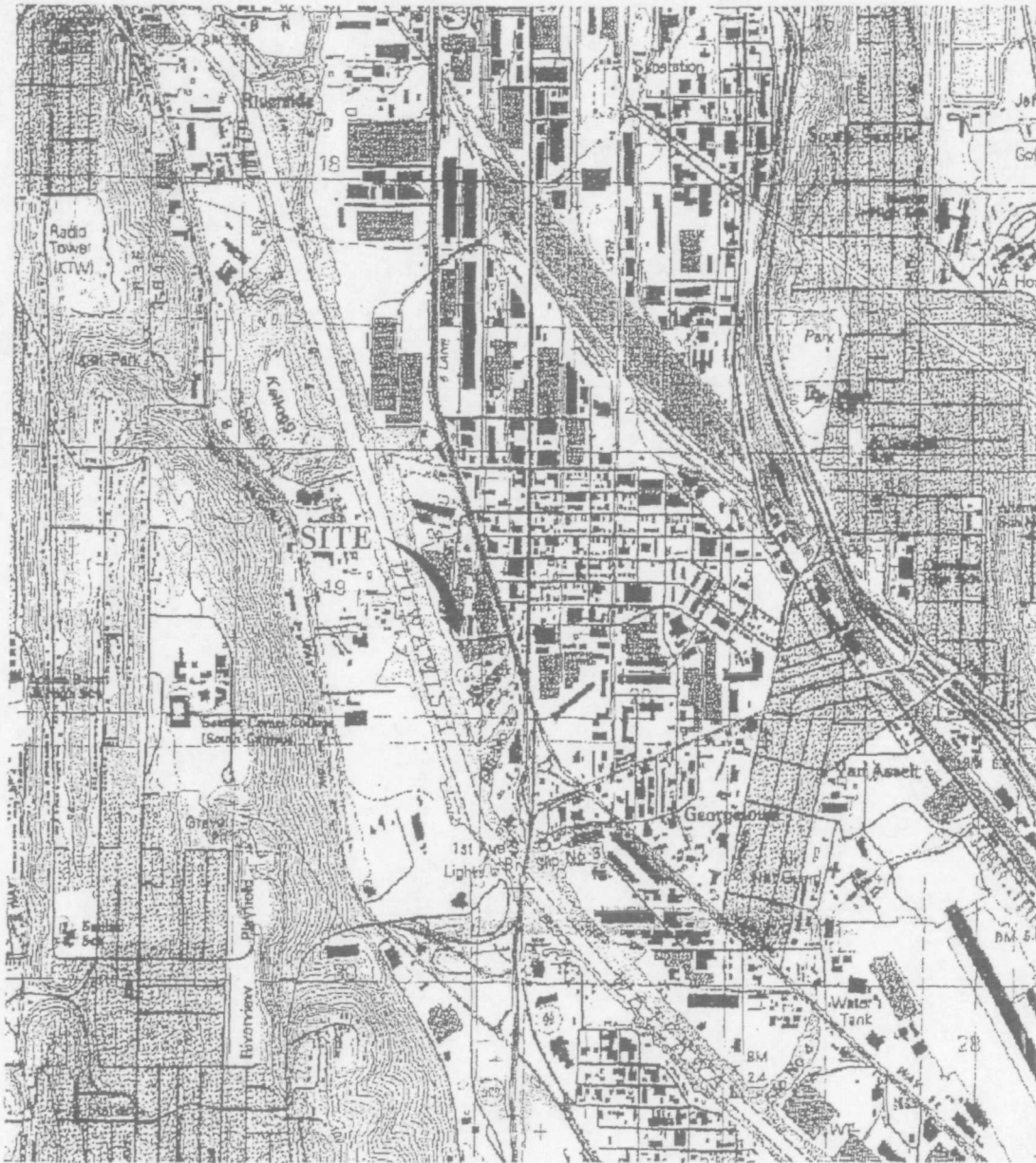
## REFERENCES

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- API. 2001. American Petroleum Institute Standard 653. Tank Inspection, Repair, Alteration, and Reconstruction. December 2001.
- Code of Federal Regulations, 40 CFR, Part 112. 2002. EPA Regulations on Oil Pollution Prevention.
- Code of Federal Regulations, 40 CFR, Part 302. 1994. Designation, Reportable Quantities, and Notification Requirements for Hazardous Substances under CERCLA, Table 302.4, List of Hazardous Substances and Reportable Quantities.
- Washington Administrative Code, Chapter 173-180D. 1992. Facility Oil Spill Prevention Plan Standards.

FIGURES

File: G:\000\_052.01\_LONGVIEW FIBRE-SEATTLE\01\001-SITE LOCATION.DWG L edited: MAR. 03, 2003 @ 2:53 p.m. by: ayoung Xrefs: none scale



Base map prepared from DeLorme 3-D TopoQuads (1999).

0 2000 4000  
SCALE IN FEET

Vancouver:  
(360) 694-2691  
Edmonds:  
(425) 744-1489  
Portland:  
(971) 544-2139



DATE 03/03/03  
DWN. AJY  
APPR. \_\_\_\_\_  
REVIS. \_\_\_\_\_  
PROJECT NO.  
0052.01.01

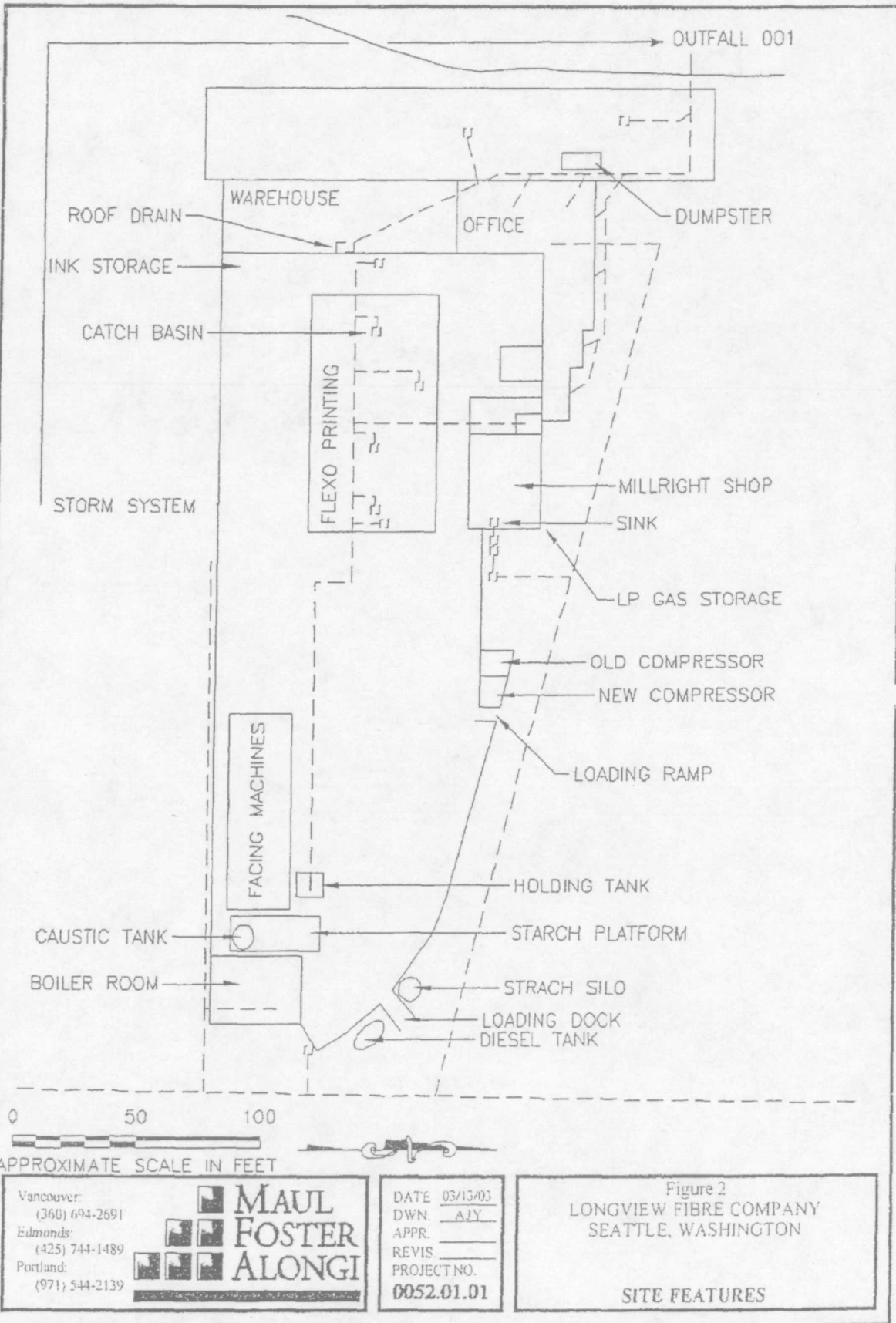
Figure 1  
LONGVIEW FIBRE COMPANY  
SEATTLE, WASHINGTON

SITE LOCATION

LAYOUT: 1

LFC002656

File: G:\00\0052.01\_LONGVIEW FIBRE-SEATTLE\01\001-SITE LAYOUT.DWG .st edited: MAR. 13, 2003 @ 12:12 p.m. by: ayoung Xrefs: Base Black/White



LAYOUT: 1

LFC002657

APPENDIX A  
SPCC PLAN REVIEW AND AMENDMENT LOG

Longview Fibre Company  
Corrugated Products Facility  
Seattle, Washington

SPCC PLAN REVIEW AND AMENDMENT LOG

Amendment Number	Summary of Amendments	Plan Section(s)	Date	Individual or Company Name	Reviewer Signature
1	Rewrite SPCC Plan	Entire Plan	April 4, 2003	Maul Foster & Alongi	
2	Update SPCC plan	Entire plan, see marked revisions in back of plan	May 13, 2005	Mike Anderson	
3	Revised SPCC Update Plan		5/17/05	G. M. McHill	<i>G. M. McHill</i>

APPENDIX B

MATERIAL TRANSFER PROCEDURES

Longview Fibre Company  
Corrugated Products Facility  
Seattle, Washington

**MATERIAL TRANSFER PROCEDURES**

**Facility Truck Loading/Unloading Operations**

- Longview Fibre Company requires all drivers of oil trucks to comply with DOT regulations in 49 CFR part 177 and facility standard operating procedures.
- The truck driver notifies Longview Fibre personnel when arriving onsite.
- Bulk diesel is delivered by tanker truck. During filling, the tanker trucks park adjacent to the tank. Any spills will be addressed immediately by driver.
- Driver must notify facility personnel prior to beginning unloading operations. Once driver has finished unloading they must notify the plant prior to departing.

APPENDIX C  
INSPECTION/PREVENTIVE MAINTENANCE FORMS

Longview Fibre Company  
Work Order Print

Date - 05/16/2005  
Time - 11:46:39  
Page - 1

EquipmentNumber C3-800100  
LEAVERBROOKS STEAM BOILER  
Description 800100MM  
Symptoms 8000MM  
Location 320 Seattle Box Plant  
Access 054 Boiler - Package  
EquipStatus ANY Anytime Work  
EquipAssigned 010 Maintenance  
EquipType PM Preventative Maintenance  
Manager 9870 Seattle Box Maintenance  
Supervisor 3070 Perantie, Eric  
PrimaryTech 3157 Puvogel, Galen R  
SecondaryTech  
Originator 3629 Crusier, Harlan J  
Estimate Start Date 04/24/2005 Commit Date

Work Order Number 367035  
Doc Type WM System Generated Work Orders  
Order Type P Preventive Maintenance WO  
Equip Type 005 Boiler (B)  
Equip. Subtype  
C. C. 8  
C. C. 9  
C.C. 10  
Status MN Complete WO  
Priority 3 Medium  
Business Unit 332300  
Parent W.O. No 00367035  
Estimated Hours  
Est End Date 04/24/2005 Actual End Date 05/02/2005

Message # : C3-0198

Standard Procedure Text  
8000MM

- ....1. Inspect Tank
- ....2. Check Valves For The Feed Line - Must Be Closed  
Unless Boiler Is Running On Diesel
- ....3. Check Valves On Containment Wall - Must Be Closed
- ....4. Test Tank Leak Alarm

Safety is First Priority. In Order To Perform The Job Safety All  
Employees Involved In The Activities Described In This Word Order, Must:  
Initial Please:

1. \_\_\_\_\_ Follow The Proper Lock Out Procedures.
2. \_\_\_\_\_ Use Appropriate Personal Protective Equipment (PPE)

When Necessary,

Maintaining Good Housekeeping Practices Is A Must;

It Is A Reflection Of Yourself To Others And Plays A Key Role

In The Overall Safety Of Our Facilities.

Keeping This In Mind Please Make Sure That You:

Initial Please:

1. \_\_\_\_\_ Dispose Of All Waste Oils Properly As Determined By  
Plant Procedures.

2. \_\_\_\_\_ Clean Up After Yourself, Pickup Rags, Tools, Etc.

Leave The Area Cleaner Than You Found It.

Report Any Additional Repairs That Time Does Not Allow To Complete.

3. CHECK LIGHTING IN STORAGE TANK AREA.....

4. INSPECT FEED AND RETURN PIPING FOR LEAKS.....

*Copy of monthly work order  
generated in J D Edwards*

F37714  
LFC0006

Longview Fibre Company  
Work Order Print

Date - 05/16/2005  
Time - 11:46:39  
Page - 2

.....Media Object.....

area is very dirty lots of paper shreds. Area that was cleaned and pig mats put down inspected piping did not find any leaks possible that fuel is leeching out of the concrete?

LFC002664

Longview Fibre Company  
Corrugated Products Facility  
Seattle, Washington

SECONDARY CONTAINMENT STORMWATER REMOVAL  
DOCUMENTATION

Containment Tank contents \_\_\_\_\_

Estimated Containment volume \_\_\_\_\_ gallons

Location \_\_\_\_\_

Date of stormwater removal \_\_\_\_\_

Separation requirements \_\_\_\_\_

Destination of oily fraction and materials \_\_\_\_\_

Destination of stormwater \_\_\_\_\_

Responsible personnel \_\_\_\_\_

Title

Printed Name

Signature

I have visually verified that discharged stormwater is free of oily film or sheen \_\_\_\_\_

Initials

Date: \_\_\_\_\_

APPENDIX D  
SPILL RESPONSE FORMS

Longview Fibre Company  
Corrugated Products Facility  
Seattle, Washington

SPILL NOTIFICATION RECORD

Where did the spill occur? \_\_\_\_\_

\_\_\_\_\_

Date/time release started \_\_\_\_\_ Date/time release stopped \_\_\_\_\_

What spilled? \_\_\_\_\_

Is material? \_\_\_\_\_ gas \_\_\_\_\_ liquid \_\_\_\_\_ solid \_\_\_\_\_ semi-solid

How much spilled? \_\_\_\_\_

How concentrated is the spilled material? \_\_\_\_\_

Describe how the release occurred. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Describe spill response. \_\_\_\_\_

\_\_\_\_\_

Waste Disposal? \_\_\_\_\_

\_\_\_\_\_

Did the spill affect? \_\_\_\_\_ air \_\_\_\_\_ groundwater \_\_\_\_\_ surface water \_\_\_\_\_ soil \_\_\_\_\_ sediment

Who discovered spill? \_\_\_\_\_ Date/time \_\_\_\_\_

Signature \_\_\_\_\_ Date/time \_\_\_\_\_

APPENDIX E  
INTEGRITY TESTING REFERENCES

Other than the new STI Standard, only API 653, *Tank Inspection, Repair, Alteration and Reconstruction*, addresses inspection of aboveground storage tanks for flammable and combustible fluids. The main targets for API 653 are the large, field-fabricated tanks that are fabricated to API 650. The extensive inspection requirements of API 653 are needed for large tanks because of the large volumes and hydrostatic pressures encountered. API 650 includes equations for calculating the steel thickness needed for a particular tank. These equations take into account pressure encountered, the type of steel used, the weld joints used, and the weld inspection testing used.

The construction and installation of the smaller shop fabricated tanks differs greatly from those needed for large, field-fabricated tanks. The shop-fabricated tanks covered by STI SP001-00 are commonly manufactured to standards, such as UL 142 or UL 2085. These Underwriters Laboratories standards include tables that specify the steel thickness based on tank diameter and capacity. Shop fabricated tanks have smaller capacities than site fabricated tanks, and therefore smaller hydrostatic pressures are encountered at the tank bottom. Shop fabricated tank capacity is rarely more than 50,000 gallons. Further, whereas API 650 tanks are always vertical, shop fabricated tanks are commonly horizontal cylindrical. The bottom of the tank is visible and the tank supports used to elevate the tank must be inspected.

The STI SP001-00 standard includes inspection techniques for all types of shop fabricated tanks, including those that are horizontal-cylindrical, vertical, and rectangular; tanks that are either single or double wall; and tanks that rest directly on the ground or that are elevated on supports. STI incorporated comments solicited from the US EPA representatives and several state representatives into the final standard, approved by STI in August. Copies of the standard are available at \$35.00 (plus \$5.00 shipping and handling) from the Steel Tank Institute, 570 Oakwood Road, Lake Zurich, IL 60047, Phone: 847/438-8265 Fax: 847/438-8766.

## 7.0 Findings and Opinions

ENSR performed a Phase I ESA of the Longview Fibre Seattle, Washington, facility, located at 5901 E. Marginal Way South (Subject Property) in conformance with ENSR's proposal, dated August 17, 2006, and the scope and limitations of ASTM Practice E 1527-05.

Per the ASTM standard, potential findings may identify recognized environmental conditions (RECs), including historical RECs (HRECs) and de minimus conditions. RECs are conditions that indicate the presence or likely presence of a release, or potential for a release, of hazardous substances or petroleum products into the structures at the Subject Property, or into the ground, groundwater, or surface water of the Subject Property. HRECs are generally conditions that in the past have been remediated to the satisfaction of the responsible regulatory agency. De minimus conditions are those situations that do not present a material risk of harm to public health or the environment and generally would not be subject to enforcement action if brought to the attention of a regulatory authority.

This assessment has revealed evidence of the following RECs:

- In 1987, three USTs were removed from the Subject Property. In the early 1990s, remediation of petroleum and contaminated groundwater associated with the USTs was undertaken. Petroleum was bailed from numerous wells on a quarterly basis for approximately six years; however, residual petroleum in soil and dissolved petroleum constituents in groundwater remain. The March 2003 letter to Longview Fibre formally changes the status of the site from "cleanup started" to "monitoring" status. The most recent groundwater sampling results, for samples collected in September 2005, indicate 250 milligrams per liter (mg/L) diesel-range organics and 34 mg/L heavy-oil-range organics in the monitoring well located west of the building. The MTCA Method A groundwater cleanup level for diesel- and heavy-oil-range organics is 0.5 mg/L. Concentrations of petroleum constituents in the groundwater sample collected from the monitoring well north of the building also exceed cleanup levels.
- On the 1929 Sanborn map, the Subject Property appears to be a part of a larger parcel that includes part of the current south adjacent property. On the 1929 Sanborn map, a structure on the south part of the Subject Property is labeled "Asbestos Block Mfg". Therefore, it appears that the Subject Property was occupied by a small asbestos product manufacturing facility. ENSR has identified this as a REC given the potential for asbestos-containing materials in the subsurface at the Subject Property.
- A September 2005 memorandum to WDOE by Geomatrix reports soil contamination on the BPB Gypsum property located approximately 30 feet from the southwest corner of the Subject Property. Chlorinated solvents, petroleum compounds, and carbon disulfide were detected at concentrations exceeding MTCA soil cleanup levels. The memorandum speculates that the source is a "chalky, fibrous material that resembled gypsum from 1.5 to 6 feet below ground surface". In light of the proximity of this source to the Subject Property, this is considered a REC.
- The Lower Duwamish Waterway (adjacent to the Subject Property to the west) is a NPL site for contaminated sediments. Contaminants of concern include organics, metals, and PCBs in sediment and surface water. Based on ENSR's prior experience, the regulatory agencies are currently identifying potentially responsible parties (PRPs) associated with this NPL site. ENSR considers this a REC with regard to the Subject Property, because neighboring properties have been notified of their PRP status.
- Northwest Enviroservice 2W (1st Avenue SW and E. Marginal Way South) is located approximately 500 feet south-southeast of the Subject Property. The site is listed in the CSCSL database as having

suspected contamination (i.e., solvents, halogenated organic compounds, and priority pollutants) and confirmed contaminated sediments. The contaminant plume reportedly has reached E. Marginal Way and may extend to the Duwamish Waterway. ENSR considers this site a potential environmental concern with regard to the Subject Property, based on the close proximity of the groundwater plume to the Subject Property.

No HRECs or de minimus conditions were identified in association with the Subject Property.

## 8.0 Conclusions

ENSR performed this Phase I Environmental Site Assessment in conformance with the scope of work and limitations of ASTM Practice E 1527 at the Longview Fibre Seattle facility. Any exception to, or deletions from, this practice are described in Section 1.3 and 1.4 of this report. ENSR's assessment revealed the following recognized environmental conditions (RECs) in connection with the Subject Property:

- Underground Storage Tank Contamination: In 1987, three USTs were removed from the Subject Property. Residual petroleum hydrocarbons in soil and dissolved petroleum constituents in groundwater remain in the subsurface. Concentrations of petroleum constituents in groundwater samples collected from on-site monitoring wells in 2005 exceed applicable regulatory cleanup levels. ENSR considers this a REC with regard to the Subject Property.
- Former Use of Subject Property: On the 1929 Sanborn map, the Subject Property appears to be a part of a larger parcel that was occupied by an asbestos product manufacturer. ENSR considers this a REC given the potential for residual asbestos-containing materials to be present in soils near the former manufacturing building (now beneath the Longview Fibre building).
- Adjacent Property Contamination: A September 2005 memorandum to WDOE by Geomatrix reports soil contamination on the BPB Gypsum property located approximately 30 feet from the southwest corner of the Subject Property. Chlorinated solvents, petroleum compounds, and carbon disulfide were detected at concentrations exceeding MTCA soil cleanup levels. In light of the proximity of this source to the Subject Property, this is considered a REC.
- Adjacent Waterway Contamination: The Lower Duwamish Waterway (adjacent to the Subject Property to the west) is a NPL site for contaminated sediments. Contaminants of concern include organics, metals, and PCBs in sediment and surface water. Based on ENSR's prior experience, the regulatory agencies are currently identifying potentially responsible parties (PRPs) associated with this NPL site. ENSR considers this a REC with regard to the Subject Property, because neighboring properties have been notified of their PRP status.
- Off-site Contamination: Northwest Enviroservice 2W, which is located approximately 500 feet south-southeast of the Subject Property, is listed in the CSCSL database as having suspected contamination and confirmed contaminated sediments. The contaminant plume reportedly has reached E. Marginal Way and may extend to the Duwamish Waterway. ENSR considers this site a potential environmental concern with regard to the Subject Property, based on the close proximity of the groundwater plume to the Subject Property.

No HRECs or de minimus conditions were identified in association with the Subject Property.